

**EXHIBIT A**

### **Plaintiff's Proposed Schedule for Selenious Acid**

<b>Event</b>	<b>Deadline</b>
Initial Status Conference	September 9, 2024 (Subject to Court's Availability)
Exchange Initial Disclosures FRCP 26(a)(1)	September 13, 2024
Disclosure of Asserted Claims L. Pat. R. 3.6(b)	September 13, 2024
Defendants' Invalidity Contentions L.Pat. R. 3.6(c), 3.3 L.Pat. R. 3.6(d), 3.4 (b,c)	October 16, 2024
Defendants' Non-Infringement Contentions L. Pat. R. 3.6(e)	October 16, 2024
Deadline for Amending Pleadings or Joining Parties	November 8, 2024
Plaintiffs' Infringement Contentions L. Pat. R. 3.6(g), 3.1 L. Pat. R. 3.6(h), 3.2	November 15, 2024
Plaintiffs' Responses to Invalidity Contentions L. Pat. R. 3.6(i), 3.4A	November 15, 2024
Status Conference	TBD (Subject to Court's Availability)
Exchange of Proposed Terms for Construction L. Pat. R. 4.1 (a, b)	November 22, 2024
Exchange of Preliminary Proposed Claim Constructions and Identification of All Supporting Intrinsic Evidence	December 11, 2024

and Designation of Supporting Extrinsic Evidence <sup>1</sup>  L.Pat. R. 4.2 (a, b)	
Exchange and Identification of All Rebuttal Intrinsic and Extrinsic Evidence  L.Pat. R. 4.2 (c, d)	December 18, 2024
File Joint Claim Construction and Prehearing Statement  L.Pat. R. 4.3	December 27, 2024
Any party, if relying upon advice of counsel as part of a patent-related claim or defense for any reason, to produce discovery related thereto for which the attorney-client and work product protection have been waived.  L. Pat. R. 3.8	January 3, 2025
Substantial Completion of Document Production	January 8, 2025
Opening Claim Construction Briefs  L.Pat. R. 4.5(a)	January 10, 2025
Completion of Expert Discovery Relating to Claim Construction  L. Pat. R. 4.5(b)	January 24, 2025
Responding Claim Construction Briefs  L. Pat. R. 4.5(c)	January 29, 2025

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<sup>1</sup> For each disputed claim term, each party shall propose constructions other than “plain and/or ordinary meaning,” without prejudice to the ability to argue that a proposed claim construction comports with the “plain and/or ordinary meaning” of the disputed claim term

Submit Proposed Schedule for Claim Construction Hearing  L. Pat. R. 4.6	January 31, 2025
Status Conference	TBD (Subject to Court's Availability)
Close of Fact Discovery	March 21, 2025
Markman Hearing	TBD
Exchange of Opening Expert Reports on Issues for Which the Party Bears the Burden of Proof  (including Plaintiffs' Expert Reports on Secondary Considerations of Non-Obviousness)	April 4, 2025
Exchange of Rebuttal Expert Reports	April 25, 2025
Status Conference	TBD (Subject to Court's Availability)
Close of Expert Discovery	May 16, 2025
Dispositive Motions	TBD
Pretrial Submissions	June 11, 2025
Pretrial Conference	Week of June 23, 2025  (Subject to Court's availability)
Trial	Week of August 4, 2025  (Subject to Court's availability)
Simultaneous Post-Trial Brief	TBD